

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

ML FASHION, LLC, and ML RETAIL,)	
)	
LLC,)	Case No. 1:20-cv-05124
)	
Plaintiffs,)	
)	
v.)	Judge Steven C. Seeger
)	
NOBELLE GW, LLC, STEPHANIE)	
MENKIN, SARIT MAMAN NAGRANI, and)	
NICOLAS GOUREAU,)	
)	
Defendants.)	

**DEFENDANTS' MOTION TO DISMISS
THE VERIFIED AMENDED COMPLAINT**

Defendants Nobelle GW LLC (“Nobelle”), Stephanie Menkin, Sarit Maman Nagrani, and Nicolas Goureau (collectively “Defendants”), through their undersigned counsel, do hereby move the Court, pursuant to Fed. R. Civ. P. 12(b)(1), 12(b)(2), 12(b)(3), and 12(b)(6), for an order dismissing Plaintiffs ML Fashion, LLC and ML Retail LLC’s claims asserted in the Verified Amended Complaint, with prejudice and as against all Defendants, as well as granting such other and further relief as the Court may deem just and proper.

This Motion is based upon the Defendants’ Memorandum of Law in Support of Their Motion to Dismiss the Verified Amended Complaint, the Affidavits of Defendants Sarit Maman Nagrani, on her own behalf and on behalf of Nobelle, Stephanie Menkin, and Nicolas Goureau in Support of Defendants’ Motion to Dismiss the Verified Amended Complaint, the records and files of this Court, any other matter of which the Court may take judicial notice, and upon such

other and further oral or documentary evidence as may be presented to the Court at or prior to any hearing on this Motion.

Dated: January 4, 2021

/s/ Elizabeth L. Janczak

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